

July 29, 2022

**VIA ECF**

The Honorable Sarah L. Cave  
United States District Court for the Southern District of New York  
500 Pearl St.  
New York, NY 10007

*Catherine McKoy, et al. v. Trump Corp., et al.*, 1:18-cv-9936 (LGS-SLC)

Dear Judge Cave:

We write briefly in connection with the Court's Order of July 26, 2022, ECF No. 449.

In accordance with the Court's directive, the parties will continue to meet and confer and will make a joint submission by August 8 concerning the status of discovery in this case (including scheduled depositions) and proposed amendments to the case management plan. We are continuing to take and defend depositions, including, in recent weeks, three of the named Plaintiffs, three of Defendants' current or former employees, and a non-party Celebrity Apprentice contestant. To date, nine depositions in this case have been completed.

But we wanted to make sure that Your Honor is aware that despite the parties' good faith and best efforts, we do not think it is possible as a practical matter to schedule depositions of all the parties, non-parties and former employees contemplated by the Courts' June 17 order, ECF No. 438, to take place before August 31. Some of the depositions require travel, and given the fact that it is late summer, the schedules of certain party and non-party witnesses, and other events beyond the parties' control, at least some of the depositions in this case will likely have to take place in September. Of course, we will continue making progress in any event and will be seeking an extension of the fact discovery schedule to no later than September 30.

Respectfully submitted,

/s/ Roberta A. Kaplan

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